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Attorneys for Plaintiff
JUUL LABS, INC.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JUUL LABS, INC.,

Plaintiff,

v.

**EONSMOKE, LLC,
ZLAB S.A.,
ZIIP LAB CO., LTD.,
SHENZHEN YIBO TECHNOLOGY CO.,
LTD., and
JOHN DOES 1-50,**

Defendants.

Civil Action No. 19-8405 (JMV) (MF)

**NOTICE OF JUUL LABS, INC.'S
UNOPPOSED MOTION TO SEAL**

Document Filed Electronically

Return Date: May 20, 2019

TO: Mark Aaron Kriegel
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and Shenzhen Yibo Technology Co., Ltd.*

PLEASE TAKE NOTICE that on **Monday, May 20, 2019, at 10:00 a.m.** or as soon thereafter as counsel may be heard, Plaintiff Juul Labs, Inc. (“Juul Labs”) shall appear before the Honorable Mark Falk, U.S.M.J., at the Martin Luther King, Jr. Federal Building and Courthouse, 50 Walnut Street, Newark, New Jersey 07102, and shall move this Court, pursuant to Local Civil Rule 5.3(c), for an Order permanently sealing portions of the following materials, which were filed under temporary seal:

- Declaration of Timothy Danaher (ECF No. 11);
- Exhibit 1 to the Declaration of Timothy Danaher (ECF No. 11-1);
- Declaration of Michael Walter (ECF No. 11-2);
- Exhibit 1 to the Declaration of Michael Walter (ECF No. 11-3); and

- Exhibit 2 to the Declaration of Michael Walter (ECF No. 11-4).¹

PLEASE TAKE FURTHER NOTICE that in support of its Motion, Juul Labs shall rely upon the Declaration of Kevin Cooke and the accompanying index found at Exhibit 1. A proposed form of Order, including Proposed Findings of Fact and Conclusions of Law, is also submitted for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that Defendants do not oppose the relief requested by Juul Labs and instead consent to the same.

Dated: April 24, 2019

Respectfully submitted,

SAIBER LLC

By: /s/ Arnold B. Calmann

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¹ The redacted versions of the foregoing documents have been filed at ECF No. 12.